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American Gas Association

DEPT. OF TRANSPORTATION
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January 18, 2000

Dockets Facility, RM PL-401
U.S. Department of Transportation
400 7th St., SW
Washington, DC

Re: Docket No. RSPA-99-6355 - 32
Pipeline Safety: Enhanced Safety and
Environmental Protection for Gas
Transmission and Hazardous Liquid
Pipelines in High-Consequence Areas

Enclosed herewith are two copies of AGA's comments to the above referenced docket. Should you have any questions, please contact me at (202) 824-7335 or via e-mail at pgustilo@aga.org.

Sincerely,

Paul P. Gustilo, P.E.
Engineering Services Manager
AGA

**BEFORE THE
RESEARCH AND SPECIAL PROGRAMS ADMINISTRATION
UNITED STATES DEPARTMENT OF TRANSPORTATION
WASHINGTON, D.C.**

Notice of Public Meeting and Request for) Docket No. RSPA-99-6355 - 32
Comments, Enhanced Safety and Environmental) Notice 2
Protection for Gas Transmission and Hazardous)
Liquid Pipelines in High Consequence Areas)

COMMENTS OF THE AMERICAN GAS ASSOCIATION

The American Gas Association (AGA) represents 189 investor-owned and municipal natural gas utilities that serve customers in all 50 states. AGA members deliver natural gas to over 93 percent of the 60 million U.S. homes and businesses that use natural gas. Additionally, AGA provides services to member natural gas pipelines, marketers, gatherers, international gas companies and a variety of industry associates. AGA collects, analyzes and disseminates information and data on the natural gas industry, promotes the safe and efficient delivery and use of energy, and serves as a national voice for the gas utility industry. AGA's U.S. members are regulated by the U.S. Department of Transportation's (DOT) Research and Special Programs Administration (RSPA) and the states for the safe design, construction, operation and maintenance of natural gas pipeline systems.

AGA respectfully submits these comments to the Research and Special Programs Administration regarding enhanced safety and environmental protection for gas transmission and hazardous liquid pipelines in high consequence areas.

General Comments

Pipeline integrity is a high priority for AGA members. Not only is it essential for pipeline safety, but also for protecting their core assets. AGA believes that current natural gas regulations adequately address the integrity of natural gas transmission lines in high consequence areas. While the natural gas safety record clearly demonstrates this, AGA members continually strive to further enhance the safety of their systems.

AGA is committed to working with RSPA on this pipeline integrity initiative and urges RSPA to continue working with all the stakeholders, and to utilize the Framework for OPS Cost-Benefit Analysis'. AGA further urges RSPA to consider the issues raised and lessons learned from the various initiatives currently in place, particularly the Risk Management and Common Ground initiatives, as well as from recent rulemaking experiences such as the Operator Qualification Rule and the Passage of Instrumented Internal Inspection Devices Rule.

Pipeline Integrity in Existing Regulations

As INGAA presented at the November 18 public meeting², most of the questions in the Notice are answered in the present natural gas pipeline safety regulations. Although the current regulations do not explicitly require a pipeline integrity process or plan, such a process is an element in achieving compliance with the regulations. Consequently, all natural gas operators have some type of pipeline integrity process in place. RSPA acknowledges this fact, as reflected in statements made by both Kelly Coyner and Richard Felder at the public meeting’.

RSPA, however, perceives a need to incorporate a “visible” regulatory process for integrating safety information required under the existing pipeline safety regulations. Any regulatory approach RSPA pursues, must be performance based to allow operators to take maximum advantage of procedures and processes already in place, while implementing a program that works best for the characteristics of their systems. Revising existing regulations to include more performance language should be considered, as exemplified by the recently issued final rule on pipeline repair⁴.

Periodic Testing

RSPA suggests that there is a need to incorporate provisions in the regulations for periodic testing to enhance pipeline integrity, and focuses on smart pigging and hydrotesting as the primary tools for periodic testing. It is critical for RSPA to realize that while smart pigging and hydrotesting are good tools, they are likely to be impracticable, cost-prohibitive, or impossible for many pipelines in high consequence areas, because of their design, operational, and environmental characteristics. Please refer to previous comments filed by AGA on periodic testing and smart pigging’.

Rather than periodic testing, RSPA should focus on periodic assessment based on reviews of inspections and records currently required in the regulations. Section 192.613 (Continuing Surveillance’) addresses this in performance language, and should be considered in lieu of a mandated periodic testing rule.

Intrastate Transmission Facilities

AGA’s gas distribution members account for about 40,000 miles of the transmission lines reported to RSPA. Most, if not all, of the 40,000 miles are intrastate facilities operated in conjunction with distribution systems, which place them under the jurisdiction of the states. AGA therefore questions whether a mandated risk-based integrity process could be consistently and effectively enforced across the 50 states, that results in measurable safety improvements. The LDC Risk Assessment Feasibility Team (LDC RAFT) is currently deliberating this very issue. The LDC RAFT is making steady and deliberate progress in assessing the feasibility of applying risk-based approaches to LDC systems, but has yet to determine whether a risk-based program is practical for LDCs. Risk-assessment, an integral element for any risk-based program, is also essential in assessing pipeline integrity. Accordingly, RSPA should closely tie its

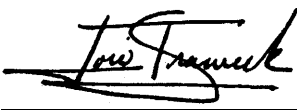
integrity efforts for intrastate transmission lines with the efforts of the LDC RAFT. AGA remains supportive of, and active on, the LDC RAFT and suggests consideration of the pipeline integrity initiative by the LDC RAFT.

Conclusion

Pipeline integrity is a top priority for AGA members. As such, AGA is committed in working with RSPA and all of the stakeholders, on this pipeline integrity initiative.

Because pipeline integrity is inherent in the existing regulations, any regulatory approach that RSPA pursues must be performance based to allow an operator to utilize existing procedures and processes already in place.

Respectfully submitted,
THE AMERICAN GAS ASSOCIATION
January 18, 2000

By: 

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End Notes

- ¹ Final Report: A Collaborative Framework for Office of Pipeline Safety Cost-Benefit Analyses. Prepared by The Joint OPS Stakeholder Workgroup, June 1999.
- ² Presentation by Terry Boss, Interstate Natural Gas Association of America, November 18, 1999, OPS Public Meeting, Herndon, VA.
- ³ Integrity Management Meeting Transcript, November 18, 1999. Obtained from OPS web site ops.dot.gov on December 13, 1999.
- ⁴ 64 FR, Dec 14, 1999, pp. 69660-69665
- ⁵
 - a. Comments of the American Gas Association to RSPA on Increased Inspection Requirements, Docket No. PS-141, Notice 1. Filed November 27, 1995.
 - b. Comments of the American Gas Association to RSPA on the Passage of Instrumented Internal Inspection Devices; Notice of Proposed Rulemaking; Response to Petitions for Reconsideration, Docket No. PS-126; Notice 2, RIN3137-AB71. Filed November 29, 1994.
 - c. Request for Administrative Stay and Petition for Reconsideration of the American Gas Association regarding Passage of Instrumented Internal Inspection Devices; Final Rule, Docket No. PS-126, Amdt. Nos. 190-5, 192-72, 193-9, 195-50. Filed May 10, 1994.
 - d. Comments of the American Gas Association regarding the Notice of Request for Information Regarding Instrumented Internal Inspection Devices, Docket No. PS-105, Notice 1. Filed June 26, 1989.